

EXHIBIT A

From: [Galín, Ross B.](#)
To: [Lollar, Tirzah](#); [Heather Hacker](#); [Ashby, Danny S.](#); [Amy Hilton](#); [Christopher Hilton](#); [Eugenia Krieg](#); [Reynolds Brissenden](#); [Andrew Stephens](#)
Cc: [Whisler, Megan](#); [Odell, Christopher M.](#); [Ramer, Paula](#)
Subject: RE: Scheduling Order Follow Up
Date: Wednesday, March 1, 2023 2:09:09 PM
Attachments: [image001.png](#)

As is PPFA.

Ross

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Wednesday, March 1, 2023 3:05 PM
To: Heather Hacker <heather@hackerstephens.com>; Ashby, Danny S. <dashby@omm.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>
Cc: Galín, Ross B. <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>
Subject: RE: Scheduling Order Follow Up

[EXTERNAL MESSAGE]

Heather:

In that case, Affiliate Defendants are opposed.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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From: Heather Hacker <heather@hackerstephens.com>
Sent: Wednesday, March 1, 2023 2:51 PM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens

<andrew@hackerstephens.com>

Cc: zzz.External.rgalin@omm.com <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

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External E-mail

Tirzah,

The dispute between you and Texas over Texas's production does not concern Relator, nor does it involve an already pending motion, so it is outside the scope of the relief that Relator is requesting.

May I state that you are unopposed to the motion Relator intends to file? Regarding the briefing schedule, that is fine with us and is similar to what we were going to propose.

Thanks,
Heather

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Wednesday, March 1, 2023 1:24 PM

To: Heather Hacker <heather@hackerstephens.com>; dashby@omm.com; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>

Cc: rgalin@omm.com; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

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Heather:

Defendants would be consent to a motion seeking partial lifting of the seal for the purpose of completing the briefing on Dkts. 425 (Relator's motion to unseal Plaintiffs' response to Defendants' motions for summary judgment and supplemental appendix) and 433 (Relator's motion to compel production of document on Defendants' privilege log), provided that Plaintiffs agree that the seal would also be lifted for the purpose of permitting Defendants and Texas to continue to meet and confer regarding Texas's compliance with Dkt. 408 (order partially granting Defendants' motion to compel against Texas) and if needed, to permit Defendants to renew their motion to compel and seek adjudication of the renewed motion to compel. Defendants are still reviewing Texas's most recent production and revised privilege log but anticipate having some follow up questions. Please let us know if Plaintiffs agree to our proposal.

If we are in agreement, we also suggest that the parties agree to a schedule to complete the briefing so there is no question about the deadlines. If the consent motion is filed today, Defendants can respond to Dkts. 425 and 433 by March 3 and would suggest that Relator file any reply in support of

Dkt. 433 by March 6, and any reply in support of Dkt. 425 by March 17. These reply deadlines would be consistent with what was in place prior to the stay.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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From: Heather Hacker <heather@hackerstephens.com>

Sent: Wednesday, March 1, 2023 1:41 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>

Cc: zzz.External.rgalin@omm.com <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: Scheduling Order Follow Up

External E-mail

Checking back in on this—I'd like to file the motion this afternoon. Thanks.

From: Heather Hacker

Sent: Tuesday, February 28, 2023 4:58 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>

Cc: rgalin@omm.com; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: Scheduling Order Follow Up

Thanks Tirzah, I appreciate it.

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Tuesday, February 28, 2023 4:46 PM

To: Heather Hacker <heather@hackerstephens.com>; dashby@omm.com; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>

Cc: rgalin@omm.com; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

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Hi Heather:

We will get back to you tomorrow but think we may be able to come to an agreement.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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From: Heather Hacker <heather@hackerstephens.com>

Sent: Tuesday, February 28, 2023 2:06 PM

To: zzz.External.dashby@omm.com <dashby@omm.com>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>

Cc: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>

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Tirzah and Danny,

We intend to file a motion to lift the stay for the limited purpose of continuing briefing on motions that were already pending before the stay was entered. Could you please let me know what your clients' position is?

Thanks,
Heather

From: Ashby, Danny S. <dashby@omm.com>
Sent: Thursday, February 23, 2023 7:42 PM
To: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>
Cc: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>
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Hi all –

Given the stay order this afternoon, I don't think we need this call unless anyone has a different view. Thanks.

Danny

Danny S. Ashby
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M: +1-214-577-9886
dasbhy@omm.com

From: Ashby, Danny S.
Sent: Wednesday, February 22, 2023 4:22 PM
To: 'Amy Hilton' <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Eugenia Krieg <Eugenia.Krieg@oag.texas.gov>; Reynolds Brissenden <Reynolds.Brissenden@oag.texas.gov>; Andrew Stephens <andrew@hackerstephens.com>
Cc: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>; Whisler, Megan <mwhisler@omm.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>
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Hi all –

Following up on our call today, below is the proposal we came up with for revised scheduling order deadlines. The grayscale reflects unchanged deadlines, which we left in so we have the whole schedule in mind. As I